

REMARKS

Applicants submit this Preliminary Amendment for consideration in conjunction with a Request for Continued Examination (RCE). Applicants have amended claims 9, 12, 13, 14, 15, 17, 19, 21, and 40 by this paper. After entry of this paper, claims 9-43 remain pending in the application.

Applicants thank the Examiner for accepting a telephone call from Applicants on July 16, 2008, and for the courtesies extended during the telephone call. In the telephone call, the Examiner indicated that the objection to the specification and rejection to the claims over 35 U.S. § 112 in the Office Action mailed January 29, 2008 have been overcome by a response filed by Applicants on May 8, 2008. Accordingly, Applicants will not respond to the objection to the specification and the rejection over 35 U.S.C. § 112 in this paper. To expedite prosecution, in this paper, Applicants further respond to the 35 U.S.C. § 102 rejection in the January 29, 2008 Office Action.

Claim Rejections under 35 U.S.C. § 102

Claims 9-43 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,130,517 to Yuan et al. ("Yuan").

Claim 9 recites "the coarse stage device comprising an attracting framework comprising opposing attracting members." The specification describes first and second E-cores 210 and 220 as examples for the attracting members. (See the specification, pp. 9-10.) The E-cores 210 and 220 may generate accelerating or decelerating forces that moves a target member. *Id.* In addition to the attracting members, claim 9 also recites an actuator coupled between the coarse stage device and the fine stage device. The specification describes an actuator 440 as an example of the actuator coupled

between the coarse stage device and the fine stage device. (*Id.* p. 11 and Amended FIGS. 4A and 4B submitted on Nov. 13, 2007.) As described at page 11 of the specification, the actuator 440 adjusts the distance between the target member and the attracting members.

The cited Yuan reference discloses magnetic actuators including e/i core actuators 121-126. (See Yuan, col. 3, ll. 12-14.) In the final Office Action dated January 29, 2008 (and also in the Adversary Action dated June 30, 2008) the Examiner equates the e-cores to the attracting members as recited in the claims. (See Final Office Action, p. 5 “a second assembly including a first attracting member [Fig. 1, 123] and a second attracting member [Fig. 1, 124].”) The Examiner also equates the same e-cores to the actuator as recited in the claims. (See Final Office Action, p. 5 “the actuator [Fig. 9; the coarse stage control system 310 combined with attracting members 123 and 124].”) Applicants respectfully disagree with the Examiner’s assertions. Yuan discloses using the e/i core actuators 121-126 for adjusting the distance between the fine stage and the coarse stage. The e/i core actuators 121-126 in Yuan cannot be used to equate both the attracting members and the actuator as recited in the claims.

The Examiner may equate the coarse stage control system 310 to the actuator as recited in the claims. Yuan discloses that the coarse stage control system 310 is a conventional coarse stage control system that controls the coarse stage 110. (See Yuan, Col. 7, ll. 49-52.) A conventional coarse stage system is typically used to move a coarse stage. Yuan fails to teach that the coarse stage control system 310 includes an actuator coupled between the coarse stage device and the fine stage device.

Claim 12 recites, in addition to the attracting members, an actuator associated with the first assembly, which includes the target member. As discussed above, the coarse stage control system 310 is for controlling the coarse stage 110. Yuan fails to teach an actuator associated with the first assembly including the target member.

Claim 13 recites, in addition to the attracting members, a fine stage actuator. As discussed above, the coarse stage control system 310 in Yuan is for controlling the coarse stage 110. Yuan fails to teach a fine stage actuator as recited in claim 13.

Claims 14, 15, 17, 19, and 21 each recite, in addition to the attracting members, at least one actuator associated with the target member to adjust the distance between the target member and at least one of the first and second attracting members. The coarse stage control system 310 in Yuan is for controlling the coarse stage 110. Yuan fails to teach an actuator associated with the target member.

Claims 24 and 32 recite an actuator provided between the attracting assembly and the target assembly, and claim 40 recites an actuator coupled between the coarse stage and the fine stage. Yuan fails to teach an actuator provided between the attracting assembly and the target assembly as recited in claims 24 and 32 or coupled between the coarse stage and the fine stage as recited in claim 40.

Dependent claims 10, 11, 16, 18, 20, 22-23, 25-31, 33-39, and 41-43 provide further aspects in addition to those in their respective base independent claims and thus should be allowable for at least the reasons as set forth above with respect to the independent claims.

Conclusion

In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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